

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION

SHARON WICK, INDIVIDUALLY AND §
AS REPRESENTATIVE OF THE ESTATE §
OF THOMAS W. WICK, SHANDALA §
TROBL, MICHAEL WICK, CRYSTAL §
TUCKER, AND AMARIS WICK HUTSLER §
§ CIVIL ACTION NO. 6:19-cv-00030
VS. §
§
ADVANCED DRAINAGE SYSTEMS, INC. §

JOINT MOTION TO AMEND SCHEDULING ORDER

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Plaintiffs, **SHARON WICK, Individually and as Representative of the Estate of THOMAS W. WICK, SHANDALA TROBL, MICHAEL WICK, CRYSTAL TUCKER and AMARIS WICK HUTSLER**, and Defendant, **ADVANCED DRAINAGE SYSTEMS, INC.**, and file this their Joint Motion to Amend Scheduling Order.

I.

On June 20, 2019, the Court issued an Order Following Telephone Scheduling Conference Held on June 19, 2019 setting forth the following schedule to govern the disposition of the case:

- Initial Disclosures due: July 1, 2019
- New parties/class allegations: None
- Plaintiff's experts to be designated: November 1, 2019
- Report furnished: November 1, 2019
- Defendant's experts to be designated: December 1, 2019
- Report furnished: December 1, 2019
- Discovery to be completed: February 28, 2020

- o Dispositive motions due: February 28, 2020
- o Docket call to be held at 11:30 AM on: June 1, 2020
- o Estimated trial time: 2-3 days Jury Trial

II.

Since June 19, 2019, written discovery has been exchanged between the parties and eight depositions have been taken. Notwithstanding the best efforts of the parties to comply with the Court's current Scheduling Order, it has become apparent to the parties that additional time is necessary in order to conduct discovery, designate experts and file dispositive motions.

Plaintiffs and Defendant hereby request that the Court extend all of the current deadlines as per the Court's Scheduling Order referenced above by at least 120 days.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendant hereby request that the Court extend all of the current deadlines by at least 120 days.

Respectfully submitted,

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SORRELS, AGOSTO & AZJZ**

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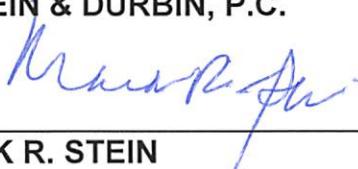
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